IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA,

v. : Case No. 1:10cr200 (LMB)

LEE BENTLEY FARKAS,

:

Defendant.

<u>DEFENDANT'S MOTION TO COMPEL PRODUCTION</u> OF DOCUMENTS AND TESTIMONY BY ERNST & YOUNG

COMES NOW the defendant, LEE BENTLEY FARKAS, by and through his counsel, and respectfully moves this Court to enter the proposed Order filed herewith compelling ERNST & YOUNG, LLP to produce documents and testimony. The grounds for this Motion are set forth in the accompanying Memorandum of points and authorities.

Respectfully submitted,

LEE BENTLEY FARKAS

By: /s/

WILLIAM B. CUMMINGS, ESQUIRE VA Bar No. 6469

Co-Counsel for LEE BENTLEY FARKAS

WILLIAM B. CUMMINGS, P.C.

Post Office Box 1177

Alexandria, Virginia 22313

(703) 836-7997

Fax (703) 836-0238

wbcpclaw@aol.com

BRUCE S. ROGOW, ESQUIRE

Pro Hac Vice

Co-Counsel for LEE BENTLEY FARKAS

BRUCE S. ROGOW, PA

500 E. Broward Boulevard, Suite 1930 Ft. Lauderdale, Florida 33394 (954) 767-8909 FAX (954) 764-1530 brogow@rogowlaw.com

CRAIG KUGLAR, ESQUIRE

Pro Hac Vice

Co-Counsel for LEE BENTLEY FARKAS

LAW OFFICE OF CRAIG KUGLAR, LLC

1130 Piedmont Avenue, #913

Atlanta, Georgia 30309

(404) 432-4448

FAX (404) 393-8007

ck@kuglarlaw.com

ZAHRA S. KARINSHAK, ESQUIRE

Pro Hac Vice

Co-Counsel for LEE BENTLEY FARKAS

KREVOLIN & HORST

1201 West Peachtree Street/One Atlantic

Center, Suite 3250

Atlanta, Georgia 30309

(404) 888-0922

FAX (404) 888-9577

karinshak@khlawfirm.com

CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of March, 2011, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to at least the following registered ECF users:

Edward J. Bennett, Esquire Attorney for ERNST & YOUNG, LLP WILLIAMS & CONNOLLY, LLP 725 12th Street, NW Washington, DC 20005 EBennett@wc.com Paul J. Nathanson, Esquire

paul.nathanson@usdoj.gov
Charles Connolly, Esquire
charles.connolly@usdoj.gov
United States Attorney's Office for
the Eastern District of Virginia
2100 Jamieson Avenue
Alexandria, Virginia 22314

/s/

WILLIAM B. CUMMINGS, ESQUIRE VA Bar No. 6469
Co-Counsel for LEE BENTLEY FARKAS WILLIAM B. CUMMINGS, P.C. Post Office Box 1177
Alexandria, Virginia 22313
(703) 836-7997
Fax (703) 836-0238
wbcpclaw@aol.com